

**O'TOOLE SCRIVO**  
A LIMITED LIABILITY COMPANY

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January 23, 2025

**Via CM/ECF**

Hon. Andre M. Espinosa, U.S.M.J.  
United States District Court, District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Courtroom MLK 2D  
Newark, New Jersey 07101

**Re:     *New Wallington Home, LLC, et al. v. Borough of Wallington, et al.***  
**Civil Case No.: 20-08178 (EP) (AME)**

Dear Judge Espinosa:

This firm represents Plaintiffs in this matter. We write to respectfully request a 30-day extension of the current expert deadlines. Currently, Plaintiffs' expert reports are due to be served on January 31, 2025; Defendants' responsive reports, if any, by March 7, 2025; and expert depositions to be completed by April 15, 2025.

The parties are moving expeditiously with discovery and will be completing fact depositions on January 27, 2025, and taking part in an in-person settlement conference with Your Honor on Thursday, January 30, 2025. Unfortunately, one of Plaintiffs' experts has had some family difficulties in recent weeks, and therefore, needs additional time to complete his report. Accordingly, Plaintiffs respectfully request a 30-day extension of the current discovery deadlines to the following: (1) Plaintiffs' expert reports to be serve by no later than February 28, 2025; (2) Defendants' reports, if any, served by no later than April 11, 2025; and (3) expert depositions to be completed by no later than May 16, 2025. Defendants' counsel has graciously consented to this request.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ James DiGiulio  
James DiGiulio

cc: All Counsel of Record (via ECF)